

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth and HTA.

**ORDER GRANTING FOUR HUNDRED SEVENTH OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO
RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO CLAIMS FOR WHICH
THE DEBTORS ARE NOT LIABLE**

Upon the *Four Hundred Seventh Omnibus Objection (Substantive) of the
Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority
Claims for Which the Debtors are Not Liable* [ECF No. 19556] (the “Four Hundred Seventh
Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (“Commonwealth”) and the

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Finaancing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Seventh Omnibus Objection.

Puerto Rico Highways and Transportation Authority (“HTA,” and together with the Commonwealth, the “Debtors”), dated December 17, 2021, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Seventh Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Seventh Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Seventh Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Four Hundred Seventh Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which neither the Commonwealth nor HTA are liable; and the Court having determined that the relief sought in the Four Hundred Seventh Omnibus Objection is in the best interests of the Commonwealth, HTA, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Seventh Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Four Hundred Seventh Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Four Hundred Seventh Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate as expunged the Claims to Be Disallowed on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 19556 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Seventh Omnibus Objection

Four Hundred Seventh Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	CRESPO PENA, GLENDA J. HC-56 BOX 5134 AGUADA, PR 00602	6/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	109470	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated the Commonwealth of Puerto Rico, but the claim and/or supporting documentation do not provide any basis for asserting liabilities against CW or any other Title III Debtor.					
2	IND LECHERAS DE P R INC PO BOX 362949 SAN JUAN, PR 00936-2949	5/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	19908	\$ 488,855.00
	Reason: Per the books and records of the Department of Agriculture, all invoices submitted by the Claimant under the Department of Agriculture's incentive program have been paid in full and there are no outstanding liabilities owed to the Claimant.					
3	TENS DEVELOPMENT, LLC. CARR.#5 KM. 4.0 BO. PALMAS CATANO, PR00962	5/24/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	36151	\$ 11,257,410.00*
	Reason: Proof of Claim asserts liability associated with a litigation filed against the Puerto Rico Highways and Transportation Authority (HTA). However, the HTA's records show that the litigation asserted was dismissed.					
					TOTAL	\$ 11,746,265.00*